

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
FIRST GUARANTY MORTGAGE	)	
CORPORATION, <i>et al.</i> , <sup>1</sup>	)	Case No. 22-10584 (CTG)
	)	
Liquidating Debtors.	)	(Jointly Administered)
	)	<b>Docket Ref. No. 725</b>

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING IN PART  
FINAL FEE APPLICATION OF PACHULSKI STANG ZIEHL & JONES LLP**

The undersigned hereby certifies the following:

1. On December 21, 2022, Debtors’ counsel Pachulski Stang Ziehl & Jones LLP (“PSZ&J”) filed its *Final Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the period from June 30, 2022 to November 6, 2022* [Docket No. 725] (the “Final Application”). Pursuant to the notice served with the Final Application, objections to the Final Application were due to be filed on or before January 11, 2023 (the “Objection Deadline”).

2. Prior to the Objection Deadline, the Office of the United States Trustee (“UST”) contacted PSZ&J and informally objected to a portion of the fees requested in the Final Application (the “Informal Objection”). After discussing the substance of the Informal Objection, PSZ&J and the UST have agreed to adjourn the hearing related to the disputed portion of the Final Application to a later date.

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors’ mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

3. The Debtors have reviewed the docket in these cases, and no party other than the UST has objected to entry of an order approving the Final Application.

4. Attached hereto as **Exhibit 1** is a proposed form of order (the “Proposed Order”) which approves the fees and expenses of PSZ&J requested by the Final Application less the amount of the fees subject to the UST’s Informal Objection.

5. Counsel is available should the Court have any questions regarding the Proposed Order.

6. It is hereby respectfully requested that the Proposed Order attached hereto as **Exhibit 1** be entered at the Court’s earliest convenience.

Dated: January 25, 2023

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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-and -

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